

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

**Heather King,
Joseph King,
Debtors**

Chapter 13

Case No. 17-13702

**MOTION TO APPROVE SECOND AMENDED
PRE-CONFIRMATION CHAPTER 13 PLAN**

Now come the debtors and move for approval of their Second Amended Pre-Confirmation Chapter 13 Plan. In support of this motion, debtors state the following:

1. Debtors filed for Chapter 13 bankruptcy protection on October 4, 2017.
2. The Second Amended Chapter 13 Plan makes the following changes:
 - a. Includes a statement of cause in Part 2(A), and
 - b. Adjusts Exhibit 1 to account for the payment Debtors have made since the last amendment.

WHEREFORE, the debtors request the court allow as follows:

1. Approval of their Second Amended Pre-Confirmation Chapter 13 Plan.
2. For such other and further relief as this court deems just.

Dated: July 27, 2018

Debtors,
by their attorney,

/s/ John Ullian
John Ullian, Esq. BBO No. 542786
The Law Firm of Ullian and Associates, P.C
220 Forbes Road, Suite 106
Braintree, MA 02184
(781) 848-5980

CERTIFICATE OF SERVICE

I John Ullian, hereby certify under the pains and penalties of perjury that I served the foregoing **MOTION TO APPROVE SECOND AMENDED PRE-CONFIRMATION CHAPTER 13 PLAN** via ECF or by mailing a copy of same postage prepaid to interested parties listed below and everyone on the attached matrix.

Carolyn Bankowski
Chapter 13 Trustee Boston
P.O. Box 8250
Boston, MA 02114

Joseph & Heather King
45 Calypso Lane
Marshfield MA 02050

John Fitzgerald, Office of the US Trustee
John W. McCormack Post Office & Court House
5 Post Office Square, 10th Floor, Suite 1000
Boston, MA 02109

Wilimngton Savings Fund Society
Kristin A. Zilberstein
The Law Offices of Michelle Ghidotti
1920 Old Tustin Ave.
Santa Ana, CA 92705

Dated: July 27, 2018

/s/ John Ullian
John Ullian, Esq.
The Law Firm of Ullian and Associates, PC
220 Forbes Road, Suite 106
Braintree, MA 02184
(781) 848-5980

Label Matrix for local noticing

0101-1

Case 17-13702

District of Massachusetts

Boston

Wed Jun 27 11:21:40 EDT 2018

Boston

U. S. Bankruptcy Court

J.W. McCormack Post Office & Court House

5 Post Office Square, Suite 1150

Boston, MA 02109-3945

Harmon Law Offices PC

150 California Street

Newton, MA 02458-1005

Naturalawn of America

American Profit Recovery

34405 W 12 Mile road, Suite 379

Farmington, MI 48331-5608

Premier Diagnostics

54 Bodwell Street, Suite C

Avon, MA 02322-1184

South Shore Hospital

55 Fogg Road

PO Box 360

South Weymouth, MA 02190-0003

South Shore Orthopedics

2 Pond Park, Suite 102

Hingham, MA 02043-4354

Strata Pathology Services

PO Box 417436

Boston, MA 02241-7436

Carolyn Bankowski-13-12

Chapter 13-12 Trustee Boston

P. O. Box 8250

Boston, MA 02114-0950

John A. Ullian

Law Offices of Ullian & Assoc.

220 Forbes Road

Suite 106

Braintree, MA 02184-2711

AMIP Management, LL as Servicer for Wilmington

3020 Old Ranch Parkway, Suite 180

Seal Beach, CA 90740-2799

Bayview Loan Servicing LLC

Bankruptcy Dept.

4425 Ponce De Leo Blvd, 5th Floor

Coral Gables, FL 33146-1837

Bayview Loan Servicing

PO Box 650091

Dallas, TX 75265-0091

Harbor Medical Assoc

77 Accord Park Drive Bldg D4

Norwell, MA 02061-1652

Kristin A. Zilberstein

The Law Offices of Michelle Ghidotti

1920 Old Tustin Ave.

Santa Ana, CA 92705-7811

Mass Bay Spine & Sport PT

506 Plain Street, Suite 101

Marshfield, MA 02050-2745

(p) PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

Peter Roberts & Assoc

231 E Main Street, Suite 201

Milford, MA 01757-2821

Premier Diagnostics

Stevens Business Service

92 Bold Street, Suite 1

PO Box 1233

Lowell, MA 01853-1233

South Coast Dermatology

90 Libbey Parkway, Suite 200

East Weymouth, MA 02189-3155

South Shore Hospital

PO Box 1021

Pembroke, MA 02359-1021

South Shore Hospital

c/o ROI

PO Box 62850

Baltimore, MD 21264-2850

South Shore Radiological

PO Box 1079

Lewiston, ME 04243-1079

South Shore Women's Health

PO Box 188

South Weymouth, MA 02190-0002

Town of Marshfield

Water & Sewer Department

Town Hall

Marshfield, MA 02050

Wilmington Savings Fund Society, FSB, DBA

3020 Old Ranch Parkway

Suite 180

Seal Beach, CA 90740-2799

Heather Dargin King

45 Calypso Lane

Marshfield, MA 02050-3601

John Fitzgerald

Office of the US Trustee

J.W. McCormack Post Office & Courthouse

5 Post Office Sq., 10th Fl, Suite 1000

Boston, MA 02109-3901

Joseph Timothy King Jr.

45 Calypso Lane

Marshfield, MA 02050-3601

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

PORTFOLIO RECOVERY ASSOCIATES, LLC
POB 41067
Norfolk, VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Wilmington Savings Fund Society

	End of Label Matrix
Mailable recipients	28
Bypassed recipients	1
Total	29